

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FRIENDSHIPCOLLAR LTD.,)	CASE NO.: 5:18-cv-478
)	
Plaintiff)	JUDGE JOHN R. ADAMS
)	
vs.)	
PAWZ LLC, et al.,)	
)	
Defendants)	

**MOTION UNDER RULES 6(b)(1)(A) AND 16(b)(4)
FOR AN EXTENSION OF TIME IN WHICH TO RESPOND TO
DISCOVERY REQUESTS AND TO AMEND PLEADINGS**

Now come Defendants PAWZ, LLC and Christian Campisi and, pursuant to Rules 6(b)(1) and 16(b)(4) of the Federal Rules of Civil Procedure, move this Court for an order extending the time defendants may have to respond to discovery requests served upon them on June 21, 2018, for which responses are due on July 23, 2018 (July 21 being a Saturday); and to amend the Case Management Plan to provide for a thirty (30) day extension of the deadlines for completion of fact discovery and identification of expert witnesses; and an additional forty-five (45) day period of time in which to amend pleadings.

Additionally, the Court has set a status conference in the matter for August 8, 2018, at which time defendants would like to discuss with the Court and with counsel for plaintiff, the possibility of immediate referral of this case to mediation.

The grounds for this motion are that “good cause” exists for the requested extensions due to the grant on July 5, 2018 of the motion of original counsel of record for defendants to withdraw, which motion was not opposed by plaintiff as prejudicial; and subsequent retention on July 11, 2018, and timely appearance commensurate with this motion, of the undersigned counsel.

These grounds are set forth with particularity in the Brief in Support below.

Respectfully submitted,

s:/Ray L. Weber

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION UNDER RULES 6(b)(1)(A) AND 16(b)(4) FOR AN EXTENSION OF TIME IN WHICH TO RESPOND TO DISCOVERY REQUESTS AND TO AMEND PLEADINGS** has been filed electronically on July 18, 2018, with the United States District Court for the Northern District of Ohio. Notice of the filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s:/Ray L. Weber